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July 21, 2023

VIA ECF

Hon. Cathy L. Waldor, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

RE: *Delahoy v. Samsung Electronics America, Inc., et al.*
Civil Action No. 22-04132 (CCC) (CLW)


Dear Judge Waldor:

Interim Class Co-Lead Counsel has, per ECF No. 45, met and conferred with counsel for Defendants Samsung Electronics America, Inc. ("SEA") and Samsung Electronics, Co., Ltd. ("SEC") regarding the deadlines for the filing of an amended consolidated class action complaint and responses to that complaint. On behalf of all Parties, we write to respectfully present a joint proposed pleading schedule to the Court for consideration:

<u>Event</u>	<u>Date</u>
Amended Consolidated Class Action Compl.	August 25, 2023
Defendants' Motion to Dismiss	October 9, 2023
Plaintiffs' Opposition to Defendants' Motion to Dismiss	November 17, 2023
Defendants' Reply in further Support of their Motion to Dismiss	December 13, 2023

We thank the Court for its kind consideration of this submission. Should Your Honor have any questions, we are available at the Court's convenience.

Respectfully submitted,



Zachary Arbitman

SO ORDERED.

s/ Cathy L. Waldor
Hon. Cathy L. Waldor, U.S.M.J.

Date: July 24, 2023